

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	No. 4:17-cv-2455
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

DECLARATION OF ALEX NELSON

I, Alex Nelson, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. I am a 1st Lieutenant in the United States Air Force.
3. I live in the area of Washington Avenue and Thirteenth Street in St. Louis, Missouri.
4. On September 17, 2017, my wife and I were in the area of Locust Street and Tucker Boulevard, where my wife and I were observing a group of protesters.
5. I was not participating in the protest and was in the area because that is where my wife and I live. We were observing the protesters while standing on a public sidewalk.
6. The protests were related to the public outrage over the acquittal of Jason Stockley, a former St. Louis police officer who shot and killed Anthony Smith in 2011.

7. I heard the police order the protesters to go either west on Locust or north on Tucker. While I was not actively protesting and did not believe that the order applied to me, I still obeyed and began walking with my wife north on Tucker Boulevard as that was the direction of my home. When we reached Washington Avenue, we turned west to walk to our home which is located on Washington Avenue.

8. At all times while I was walking in the area, I was complying with the law.

9. While on the corner of Washington Avenue and Tucker Boulevard, I never heard any police warnings and there was no order to disperse. Police officers were smoking cigars and some were chatting with pedestrians.

10. When my wife and I were approximately eighty feet from our house, suddenly and without warning, a line of police in riot gear marched in front of us. We were forced approximately five hundred feet back down Washington Avenue towards Tucker Boulevard.

11. I did not observe anyone in the area breaking the law.

12. My wife and I were surrounded on all four sides and forced onto the ground.

13. The police began to use pepper spray indiscriminately on everyone in the now surrounded crowd of people.

14. I was pepper sprayed in the face so that I could not see. While blinded, I was hit in the head, beaten, and dragged on my face, arm and shoulder.

15. In addition to being pepper sprayed and beaten, I was restrained with my hands behind my back and arrested.

16. After being pepper sprayed, and while I was being dragged on the ground by the police, an unknown police officer started to laugh at me and I could feel that my face was

covered in discharge from my nose. While laughing he said, “You like that cocksucker. It’s ok, we’ll see you out here tomorrow night.”

17. I was taken to the jail and put in a cell.

18. The police called out each of us one by one from the cell and then removed our restraints. I was the last person called out of my cell to have the restraints removed. My hands were restrained for approximately three to four hours.

19. I was detained until 5:30 p.m. on September 18, 2017.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 28th day of September, 2017.

By: /s/ Alex Nelson
Alex Nelson